

VIRGINIA E. FORTUNATO, L.L.C.
One Kinderkamack Road
Hackensack, New Jersey 07601
Tel. 201-673-5777

Virginia E. Fortunato, Esq.
Attorney for Debtors, Edin Halilovic and Almira Halilovic

In Re:

**EDIN HALILOVIC and
ALMIRA HALILOVIC,**

Debtors.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Case No. 24-16002/TBA

Judge: TBA

Chapter 13

CHAPTER 13 ATTORNEY'S CERTIFICATION IN OPPOSITION TO

☒ **CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

☐ **TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor(s), through their counsel, in the above-captioned Chapter 13 Proceeding hereby object(s) to the following:

1. ☒ Motion for Relief from the Automatic Stay filed

by BMW Financial Services, creditor,

A hearing has been scheduled for August 6, 2025, at 10:00 a.m.

OR

- ☐ Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____ m.

- ☐ Certification of Default filed by _____, creditor.

I am requesting a hearing be scheduled on this matter.

OR

- ☐ Certification of Default filed by Standing Chapter 13 Trustee.

I am requesting a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons:

☐ Payments have been made in the amount of \$_____, but have not been account for. Documentation in support is attached hereto.

☐ Payments have not been made for the following reasons and the debtor proposes repayment as follows (**explain your answer**):

☒ **Other (explain your answer):** The debtors are requesting additional time to review their bank statements which were ordered from the bank. The debtor wife is traveling for business and will not be able to review same until this coming weekend. It is requesting that the matter be adjourned two weeks.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

DATED: July 30, 2025



/s/ Virginia E. Fortunato
VIRGINIA E. FORTUNATO, ESQ.
Attorney for Debtors

NOTE:

1. This form must be filed with the Court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss*.
2. This form must be filed with the Court and served upon the Standing Chapter 13 Trustee and creditor within 14 days of the filing of a *Creditor's Certification of Default (under an Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions) or a Trustee's Certification of Default*.

If this form is not filed the Motion or Certification of Default will be deemed uncontested and no hearing will be scheduled.